

1 THE HONORABLE RICHARD S. MARTINEZ
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 Adrianna Killam,
11 Plaintiff,

12 v.
13 Port of Seattle,
14 Defendant.

Case No.: 2:20-cv-00432-RSM

STIPULATION AND ORDER FOR
STAY OF CASE UNTIL JUNE 5
PENDING SETTLEMENT
NEGOTIATIONS

NOTED FOR CONSIDERATION:
May 7, 2020

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16 **I. STIPULATION**

17 Plaintiff Adrianna Killam filed her Complaint for Declaratory and Injunctive Demand on
18 March 20, 2020 (Dkt. # 1). In order to provide the Parties with additional time to fully explore
19 early settlement resolution, the parties, by and through their respective counsel of record, hereby
20 stipulate and move for an order temporarily staying litigation on this case until June 5, 2020.

21 This brief extension of time will permit the parties to engage in settlement discussions
22 that have already commenced and potentially resolve this matter without further action by the
23 Court. The Parties believe that these settlement efforts will be compromised by simultaneous

1 prelitigation civil filings and practice and that there is good cause for the stay requested.
2 Representative counsel for the parties agreed to an extension during a telephone discussion on
3 Wednesday, May 6th, 2020.

4 Thus, the Parties respectfully request the Court to enter an Order:

- 5 i. Staying this action for all purposes until June 5, 2020, so that the Parties can focus
6 on and conduct settlement negotiations; and
- 7 ii. Scheduling a status hearing date for the Parties to file a joint report, or other event
8 that will permit the Parties to update the Court on the progress of settlement
9 efforts following the conclusion of the stay on June 5, 2020.

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11 EXECUTED at Seattle, WA, this 7th day of May 2020.

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13 STOKES LAWRENCE, P.S.

14 By: /s/ Justo G. Gonzalez
15 Justo G. Gonzalez (WSBA #39127)

16 By: /s/ Joshua D. Harms
17 Joshua D. Harms (WSBA #55679)

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22 Attorneys for Defendant Port of Seattle

WASHINGTON CIVIL AND DISABILITY
ADVOCATE

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24 Attorneys for Plaintiff Adrianna Killiam

ORDER

Based on the foregoing Stipulation and Motion, IT IS SO ORDERED that Defendant's deadline to file a responsive pleading is extended to June 5, 2020. The parties are directed to file a joint status report no later than June 4, 2020, indicating:

- 1) Whether the stay should be lifted or extended;
 - 2) The agreed date upon which Defendant's responsive pleading is due; and
 - 3) Proposed dates for the Court to reset deadlines for the FRCP 26(f) conference, initial disclosures, and a combined joint status report and discovery plan.

DATED this 8th day of May, 2020.


RICARDO S. MARTINEZ
CHIEF UNITED STATES

Presented by:

STOKES LAWRENCE, P.S.

By: /s/ Justo G. Gonzalez

Justo G. Gonzalez (WSBA #39127)

By: /s/ Joshua D. Harms

Joshua D. Harms (WSBA #55679)

Attorneys for Defendant Port of Seattle

1 WASHINGTON CIVIL AND DISABILITY ADVOCATE

2 By: /s/ Conrad Reynoldson
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4 By: /s/ Michael M. Terasaki
Michael M. Terasaki (WSBA #51923)

5 Attorneys for Plaintiff Adrianna Killiam

6 5/7/2020 - Mr. Reynoldson and Mr. Terasaki
7 Confirmed E-Signature via E-mail